

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

John M. Bisasor
IN RE:

Andre Bisasor
Debtor,

)
Chapter 7
Case No.: 15-13369

2016 JAN 22 PM 3 13
US BANKRUPTCY COURT

REQUEST TO RECONSIDER MOTION TO WAIVE APPELLATE FEES

I, Andre Bisasor, hereby request reconsideration of the motion to waive appellate fees. In support of this, I state the following:

PROCEDURAL HISTORY

1. On November 2, 2015, my attorney David G. Baker filed a motion to extend time to file a notice of appeal (relating to the court's ruling on October 19, 2015, hereinafter "first appeal") for 14 days until November 16, 2015. NB: He had agreed to represent me on my appeals regarding the rulings of this court on October 19, 2015, i.e. my first appeal, and October 21, 2015 (hereinafter "second appeal"). In that motion on 11/2/15, Mr. Baker acknowledged that the extension was requested because negotiations with the Landlord were underway and that there was progress in those negotiations (as he was cc'd on all such communications and/or asked to pass along communications from the landlord to me).
2. The court allowed the motion on November 4, 2015.
3. However, there was another deadline to file a notice of appeal for my second appeal (regarding the ruling on October 21, 2015 on the co-debtor stay) that was to expire on November 4, 2015. Mr. Baker forgot to file an extension request on that appeal as well. Mr. Baker was nowhere to be reached and so at the last minute on November 4, 2015, I rushed to the court to file a notice of appeal on my own (at about 5pm at closing of the court office), so that my legal position would not be destroyed because of my attorney's negligence.